

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
MOHEED OASMAN, :  
a/k/a "Feisal," :  
:  
Defendant. :  
:  
- - - - - x

USDC SDNY  
DOCUMENT  
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INFORMATION

7/26/08  
S1 07 Cr. 837 (VM)

COUNT ONE

The United States Attorney charges:

1. From at least in or about January 2007 until in or about July 2007, in the Southern District of New York and elsewhere, MOHEED OASMAN, a/k/a "Feisal," the defendant, together with others known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit robbery, as that terms is defined in Title 18, United States Code, Section 1951(b)(1), and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, MOHEED OASMAN, a/k/a "Feisal," and his co-conspirators would and did steal money and drugs from drug dealers and individuals engaged in commercial activities that affected interstate commerce.

(Title 18, United States Code, Section 1951.)

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COUNT TWO

The United States Attorney further charges:

2. In or about April 2007, in the Southern District of New York and elsewhere, MOHEED OASMAN, a/k/a "Feisal," the defendant, unlawfully, willfully and knowingly did attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, MOHEED OASMAN, a/k/a "Feisal," and others known and unknown, attempted to steal money from the home of a business person who lived in Queens, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE

The United States Attorney further charges:

3. In or about June 2007, in the Southern District of New York and elsewhere, MOHEED OASMAN, a/k/a "Feisal," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

4. It was a part and an object of the conspiracy that MOHEED OASMAN, a/k/a "Feisal," the defendant, and others known

and unknown, would and did distribute, and possess with intent to distribute controlled substances, to wit, 500 grams and more of cocaine, in violation of Title 21, United States Code, Sections 812, 841(a) and 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

COUNT FOUR

The United States Attorney further charges:

5. In or about June 2007, in the Southern District of New York and elsewhere, MOHEED OASMAN, a/k/a "Feisal," the defendant, and others, known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Sections 2312 and 2313 of Title 18, United States Code.

6. It was a part and object of the conspiracy that MOHEED OASMAN, a/k/a "Feisal," the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did transport in interstate commerce motor vehicles, knowing the same to have been stolen, in violation of Section 2312 of Title 18, United States Code.

7. It was further a part and object of the conspiracy that MOHEED OASMAN, a/k/a "Feisal," the defendant, and others known and unknown, unlawfully, willfully, and knowingly would and did receive, possess, conceal, store, barter, sell, and dispose

of motor vehicles, which had crossed a State boundary after being stolen, knowing the same to have been stolen, in violation of Section 2313 of Title 18, United States Code.

(Title 18, United States Code, Section 371.)

COUNT FIVE

The United States Attorney further charges:

8. From in or about March 2006 through in or about May 2006, in the Southern District of New York and elsewhere, MOHEED OASMAN, a/k/a "Feisal," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Section 1343.

9. It was a part and an object of the conspiracy that MOHEED OASMAN, a/k/a "Feisal," the defendant, and others known and unknown, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud financial institutions, and for obtaining money and property from financial institutions and banks, by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States

Code, Section 1343.

MEANS OF THE CONSPIRACY

10. It was a means of the conspiracy that MOHEED OASMAN, a/k/a "Feisal," the defendant, submitted, caused to be submitted, and aided and abetted others to submit, false financial information to lending institutions and others in order to procure loans for the purchase of residential real estate.

OVERT ACTS

11. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act was committed in the Southern District of New York and elsewhere:

a. From in or about March 2006 through in or about May 2006, MOHEED OASMAN, a/k/a "Feisal," the defendant, caused others to submit false information to financial institutions and banks on loan application documents.

(Title 18, United States Code, Section 1349.)

COUNT SIX

The United States Attorney further charges:

12. From at least in or about January 2007 until in or about July 2007, in the Southern District of New York and elsewhere, MOHEED OASMAN, a/k/a "Feisal," the defendant, unlawfully, willfully and knowingly used and carried a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the robbery

conspiracy charged in Count One of this Information, and possessed a firearm in furtherance of said crime, during which a firearm was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), (iii) and 2.)

FORFEITURE ALLEGATION

13. As the result of committing the robbery conspiracy alleged in Count One of this Information, in violation of Title 18, United States Code, Section 1951, MOHEED OASMAN, a/k/a "Feisal," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to the following:

a. At least \$160,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained by MOHEED OASMAN, a/k/a "Feisal," the defendant, as a result of the robbery conspiracy alleged in Count One of this Information.

(Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.)

  
MICHAEL J. GARCIA  
United States Attorney